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*Attorneys for Plaintiff Securities and Exchange Commission*

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J.

Case No.: 2:23-cv-00482-RJS

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION’S  
UNOPPOSED MOTION FOR  
LEAVE TO FILE OVERLENGTH  
RESPONSE TO THE COURT’S  
NOVEMBER 30, 2023 ORDER TO  
SHOW CAUSE**

Chief Judge Robert J. Shelby  
Magistrate Judge Dustin B. Pead

STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to DUCivR 7-1(a)(7)(A), Plaintiff Securities and Exchange Commission (“Commission”), through undersigned counsel, respectfully requests leave to file an overlength written response to the Court’s November 30, 2023 Order to Show Cause as to why the Court should not impose sanctions (Doc. 215) (“Order to Show Cause”). Counsel is not aware of a rule expressly addressing the page limits for a response to an order to show cause. For purposes of this motion, counsel assumes that DUCivR 7-1(a)(4)(D) applies and that the page limit for the response to the Order to Show Cause is 10 pages. The Commission requests up to an additional 10 pages (20 pages in total) for its response to the Order to Show Cause. Undersigned counsel conferred with counsel for Defendants, who stated that they do not object to this request.

Good cause exists for the Commission’s request to file an overlength response. The

Court expressed serious concerns in its Order to Show Cause and directed the Commission to address specific questions. Additional pages are necessary to ensure that the Commission can adequately address the Court's concerns and questions.

WHEREFORE, the Commission respectfully requests leave to file an overlength response with an additional 10 pages (20 pages in total).

Dated: December 19, 2023

Respectfully submitted,

/s/ Michael S. Bailey

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of December, 2023, I caused the foregoing to be served to all parties entitled to service through the Court's ECF system.

*/s/ Michael S. Bailey*  
Michael S. Bailey

*Attorney for Plaintiff Securities and Exchange  
Commission*